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8 **UNITED STATES DISTRICT COURT**  
9 **WESTERN DISTRICT OF WASHINGTON**  
10 **TACOMA DIVISION**

11 JOHN DOE #1, an individual, JOHN DOE #2,  
12 an individual, and PROTECT MARRIAGE  
WASHINGTON,

13 Plaintiffs,

14 vs.

15 SAM REED, in his official capacity as  
16 Secretary of State of Washington, BRENDA  
17 GALARZA, in her official capacity as Public  
Records Officer for the Secretary of State of  
Washington,

18 Defendants.

No. 3:09-CV-05456-BHS

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' MOTION FOR  
PROTECTIVE ORDER**

The Honorable Benjamin H. Settle

1 Having considered Plaintiffs' Motion for Protective Order, the Court being fully advised,  
2 and good cause shown:

3 **IT IS HEREBY ORDERED** that Plaintiffs' Motion for Protective Order is **GRANTED**;  
4 Plaintiffs having demonstrated that compelling justification exists to warrant the issuance of a  
5 protective order and for leave to file documents under seal.

6 **IT IS HEREBY ORDERED** that:

7 (1) Plaintiffs may file under seal any declaration of a(n):

8 (a) individual that signed the Referendum 71 petition;

9 (b) individual or organization that supported the Referendum 71 petition process;

10 (c) individual or organization that is a member of, or contributor to, Protect Marriage  
11 Washington;

12 (d) individual or organization that opposes Referendum 71;

13 (e) individual or organization that supports a traditional definition of marriage.

14 (2) All parties shall redact any personal information from any and all filings not filed under  
15 seal that could be used to identify a(n):

16 (a) individual that signed the Referendum 71 petition;

17 (b) individual or organization that supported the Referendum 71 petition process;

18 (c) individual or organization that is a member of, or contributor to, Protect Marriage  
19 Washington;

20 (d) individual or organization that opposes Referendum 71;

21 (e) individual or organization that supports a traditional definition of marriage.

22 (3) The parties may file an additional unredacted copy under seal, if the Court so desires, of  
23 any document that is redacted pursuant to FRCP 5.2(f), or in the alternative, leave to file  
24 a reference list under seal pursuant to FRCP 5.2(g);

25 (4) Defendants, their agents, servants, employees, officials, or any other person acting in  
26 concert with them or on their behalf, are prohibited from revealing the name of any:

27 (a) individual that signed the Referendum 71 petition;

28 (b) individual or organization that supported the Referendum 71 petition process;

(c) individual or organization that is a member of, or contributor to, Protect Marriage Washington;

(d) individual or organization that opposes Referendum 71;

(e) individual or organization that supports a traditional definition of marriage.

(5) The parties shall meet and confer within thirty (30) days of this order to discuss a stipulated protective order that would allow Defendants appropriate access to any documents filed under seal pursuant to this Order.

Respectfully submitted this 28th day of July, 2009.

Presented By:

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*\*Admitted Pro Hac Vice*

Dated this \_\_\_\_\_ day of August, 2009.

\_\_\_\_\_  
JUDGE BENJAMIN H. SETTLE